



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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August 11, 2016

**BY ECF**

Hon. Laura Taylor Swain  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: Mark Nunez v. City of New York, et al., 11-CV-5845 (LTS) (JCF)

Your Honor:

We write with the consent of all parties and the Court-appointed monitor, and in furtherance of our prior letter requests that Your Honor granted (Dkt. 273, 276, 278, 280). The parties have resolved the vast majority of their disagreements with regard to confidentiality, with one exception. Despite the best efforts and good faith of all sides, we have not been able to resolve one issue concerning the Department of Correction's preliminary reviews of use of force incidents, contemplated by Section VII, paragraph 7, of the consent decree. Accordingly, the parties jointly request the following briefing schedule for the City's anticipated motion for a protective order:

- Motion due on or before August 17, 2016;
- Opposition due on or before August 25, 2016;
- Reply, if any, due on or before September 1, 2016.

Respectfully submitted,

/s/  
Arthur G. Larkin, Esq.  
Senior Counsel

cc: All Counsel (by ECF)